

to Dismiss together with her First Amended Answer to Plaintiffs' Amended Complaint and Counterclaim in order to fully and coherently address all issues raised in Plaintiffs' Motion to Dismiss within the extended timeframe allowed by the Court – on or before November 27, 2020. However, more than twenty-one (21) days have expired since the October 27, 2020 date Plaintiffs' filed their Motion to Dismiss. Therefore, Guerra respectfully seeks leave of Court pursuant to FRCP 15(a)(1)(B) to file her First Amended Answer, Affirmative Defenses, and First Amended Counterclaim (the "Amended Counterclaim"). In accordance with Local Rule CV-7(b), a copy of the Amended Counterclaim is included with this Motion for Leave.

3. FRCP15(a)(2) provides that the court should freely give leave when justice so requires.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendant Guerra respectfully prays that this Motion for Leave to File her First Amended Answer, Affirmative Defenses, and First Amended Counterclaim be granted and that the Court grant Defendant Guerra all such other and further relief, both general and special, at law or in equity, to which Defendant Guerra may be entitled.

Dated: November 27, 2020.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on this 27th day of November 2020, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the parties on record.

/s/Ricardo G. Cedillo
RICARDO G. CEDILLO